

Minutes for Rule 21 Working Group Meeting #59
September 29, 2004
San Diego Gas & Electric

There were 28 Working Group members in attendance. The next Meeting of the Working Group is scheduled for October 13 at Southern California Edison in Fontana, CA.

Scott Tomashefsky, Chair

Pat	Aldridge	SCE	Dave	Michel	CEC
Manuel	Alvarez	SCE	Randy	Minnier	MPE Consulting
Chuck	Arthur	Arthur Engineering	Steven	Ng	PG&E
Werner	Blumer	CPUC/ED	Ken	Parks	SDG&E
David	Brown	SMUD	Edan	Prabhu	Reflective Energies
George	Couts	SCE	Mark	Rawson	CEC
Kevin	Duggan	Capstone Turbine	Jim	Ross	CAC/EPUC
Jeff	Goh	PG&E	Nora	Sheriff	CAC/EPUC
Dana	Griffith	NCPA	Richard	Smith	SDG&E
Mike	Iammarino	SDG&E	Dan	Tunncliff	SCE
Karl	Iliev	SDG&E	Mohammad	Vaziri	PG&E
Jerry	Jackson	PG&E	Chuck	Whitaker	Endecon Engrg
Scott	Lacy	SCE	Eric	Wong	Cummins West, Inc
Mike	Mazur	3 Phases Ergy Serv.			

Advice Letter Progress and Status

SCE has amended its Advice Letter to reflect the Grand Reconciliation version. SDG&E will do so shortly and PG&E will file their advice letter reflecting the GR version.

There was some debate on whether the CPUC can approve the revisions to Rule 21 requested by the three IOU Advice Letters. The hang-up is the protest filed by the city of San Diego. Werner Blumer has spoken with Tom Blair of the City of San Diego, inquiring whether the city will withdraw or modify the protest letter, but there is no resolution yet. Edan will follow up with Tom Blair.

A separate issue is whether the CPUC can approve the Rule 21 changes for the other two IOUs.

The Working Group will give high priority to resolving the issues raised in the protest filing. Therefore, if the city of San Diego withdraws its protest, it will still have a path to resolution. Rule 21 is not a CPUC rule, it is a CPUC-approved Utility rule.

CRS Quarterly Data Reports (Per CPUC Resolution E-3831)

Scott Tomashefsky has followed up with Valerie Beck of the CPUC regarding the Working Group's feeling that the report is unnecessary. She has informally concurred, but Scott will request the PUC position in writing before the reports are due on Oct. 8.

Review of Final Focus II DG Monitoring Report

The comment period was extended again to accommodate utility comments. The Final Final date is the week prior to the October 27th meeting.

DG OIR (R.04-03-017) Action item review

Working Group meeting No. 59 focused primarily on two items from the Scoping Order: *Generator Net Metering Issues* and *Net Metering for Systems with “Combined” Technologies*.

Generator Net Metering

Nora Sheriff had created a new draft of an earlier white paper which was modified during Meeting 58. Dan Tunnicliff prepared suggested changes to Nora’s document. This draft included a list of legal or regulatory requirements that require Generator Net metering prepared by Pat Aldridge and Dan Tunnicliff.

Randy Minnier provided a summary of the range of Generator Net Metering costs.

Net Metering for Systems with “Combined” Technologies.

The NEM Combined Technology (CT) tariff was discussed. Power plants for Bio digester NEM are larger, and machine based, making issues related to combined technologies more complicated. Among the potential solutions to NEM issues are:

- Non-NEM Generator reverse power relay trip when export begins
- Meter the NEM or the DG at the generator and use the information for separating charges
- Load following system that manages power on the non NEM generator so that it never exceeds house load.

Each solution has pros and cons from both perspectives (IOU and developer).

It was suggested that the “combined technologies solution address all combinations of NEM and non-NEM, so that the issue never raises its ugly head again.

It was also suggested that telemetry requirements be considered to be integrated into the metering. The ISO has softened its requirements for Telemetering.

Interconnection Fees/Costs

PG&E has suggested changes to the Gerry Torribio draft data collection matrix. The will provide a modified form with PG&E data before Meeting 60.

Jerry Jackson (PG&E) indicated that the regulatory change suggested in Edan Prabhu’s Beige paper is probably not necessary. PG&E has reviewed the inspection practices of the other utilities and is changing its procedures to be consistent. The new practices have reduced the inspection costs to the point where the number of inspections needed has been reduced, so that the cost is no longer a major consideration.

PG&E (Moh Vaziri) had volunteered to provide a showing of cost categories involved in interconnections. He is working on it and should have it ready soon. He said that there are four or five commonly occurring tasks for a common interconnection, and he would provide the typical cost ranges for these. The Working Group will review Moh's list..

Dispute Resolution Process

PG&E is reviewing the options for dispute resolution and will present its recommendations at meeting No..60 in Fontana.

Interconnection Rules for Network Systems

The technical committee presented its draft plan (a revised draft is attached) for developing interconnection rules for Network systems, as directed in DG OIR (R.04-03-017). The plan broadly outlines the actions that should be taken to understand and address the unique issues related to interconnection to network secondary distribution systems. The combined group was asked what changes or additions would be necessary to meet the DG OIR objectives for such a plan. It was suggested that the plan provide a bit more discussion of the status of other network-related activities (e.g., DUIT, Massachusetts Technical Collaborative, etc.). So far there have been about six applications for interconnections to networks nationally. San Francisco and Sacramento have networks, as do Portland and Seattle. Los Angeles and San Diego do not. It was generally felt that network interconnection applications are important to pursue.

Technical Breakout Group

Action Item T110 - Networks:

The plan developed at the previous meeting to address the OIR Network task was presented and reviewed in the combined session. A suggestion was made to add some additional discussion of the status of other network interconnection activities (e.g., DUIT, Massachusetts Technical Collaborative, etc.).

Moh Vaziri and Jeff Goh provided an introductory paragraph to the Network Plan. It was distributed only the day before the meeting, so we decided not to review it, but asked that committee members review it and forward comments.

We were also introduced to the PG&E draft interconnection requirements document for spot networks (attached). Committee members are likewise asked to review the document and forward comments.

Action Item T107 - Alternate Tests:

A final version of the T107 document was reviewed. Changes from the previous version were minor. A final/clean version will be distributed and committee members will be given 2 weeks for comments after which it will be considered done.

Action Item T126 - PG&E White Paper:

PG&E provided a final copy of the PG&E white paper and asked that Action Item T126 be considered completed.

Action Item T121 - Line Section Definition:

At the previous meeting, Moh Vaziri outlined cases where exporting systems on shared transformer secondaries could lead to over-voltage conditions (within the Rule 21 trip limits, but outside ANSI C84.1 Range A/CPUC Rule 2 regulation requirements) for neighboring customers. If the line section definition within the Supplemental Review Guideline was modified to include a transformer fuse as an automatic disconnecting device (which it now explicitly excludes) then these systems would likely exceed the 15% line section screen and allow them to be reviewed under Supplemental Review. Subsequently, Moh provided a paragraph to be inserted in the definition:

A service transformer supplying multiple services in a shared secondary configuration system maybe considered a line section. This transformer and its connected secondary system is part of the Utility's Distribution System, and should be reviewed as line section for loading and voltage concerns.

It was pointed out that this would also fail non-exporting systems, so additional language limiting this to exporting systems will be provided prior to the next meeting.

Action Item T113 - Redundancy:

We briefly touched on this topic in reviewing the PG&E Network Interconnection requirements and the T107 write-up. No new conclusions were reached, though PG&E described more of their position on this issue (typically don't require redundant relaying on small, inverter based DG, but do on larger machined based; consider 3-phase voltage measurements as sufficiently redundant).

Action Item C101 - Export

Karl Iliev had forwarded to a small group additional changes to his Export Screen document. While he was not ready to send the document to the entire group, we did review his current revision and explained how he had revised the document.

New/Old member

David Brown of SMUD attended the meeting in replacement of the recently retired Jim Skeen. David, who participated in the Rule 21 development at the beginning of the process, had been replaced on the committee by Jim Skeen several years ago. Dave was not willing to share with us what unseemly deed he had done to receive this punishment, but we are ready to overlook any transgressions and welcome his experience and steady influence to this committee.

NEXT MEETING

The next meeting will focus primarily on Combined Technologies, Costs/Fees and Dispute Resolution.

To Do List:

- Chuck Solt will send activity reports for all 3 utilities before Meeting 60.
- Edan Prabhu will contact Tom Blair of the City of San Diego to determine the status of the Protest.

- Scott Tomashefsky will attempt to get Valerie Beck to provide a written instruction on the quarterly report before October 8.
- Mohammad Vaziri (and any others who choose to do so) will provide comments on the Focus II Final DG Monitoring Report before October 27.
- Nora Sheriff will provide a re-edited version of the white paper on DG Monitoring.
- **Jerry Jackson will provide a new draft of the Cost Data Collection form with PG&E data.**
- **Moh Vaziri will provide installation cost information on DG interconnections.**
- Jerry Jackson will have a white paper by October 11.

Attachments:

- Development Plan for Interconnection Rules for Secondary Network Systems
- PG&E draft interconnection requirements document for spot networks